

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**The Western Massachusetts Electric
Company**

D.T.E. 06-35

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

- AG-1-1 Refer to the Testimony of Robert A. Bauman, page 8. Describe in detail and separately quantify the SCR costs for 2005 and 2006, including any estimates. How long does the Company anticipate that it will continue to incur SCR costs?
- AG-1-2 What were the specific causes for the SCR costs incurred by the Company in 2005 and 2006 (to date)? Include in this response a plain language description of the causes along with any technical / engineering explanation, and copies of all communications with the ISO requesting dispatch of the SCR resources. Also list in this response the specific SCR resources dispatched, along with the dates of dispatch and the associated costs for each SCR resource.
- AG-1-3 What are the actions the Company could have taken to avoid incurring the SCR costs described in response to AG-1-2? If the action involves an investment in plant and/or equipment, describe the plant and equipment and indicate whether the investment is transmission or distribution plant and/or equipment.
- AG-1-4 What is the estimated cost of the action that the Company could take to eliminate the SCR costs as described in response to AG-1-3? Provide all work papers, calculations and assumption in this response.
- AG-1-5 Why did the Company not take the actions described in the response to AG-1-3 prior to incurring the SCR costs? Identify and produce copies of all analysis, reports, memorandums, e-mails and other documents that relate to the actions described in response to AG-1-3.
- AG-1-6 What actions has the Company taken since 2004 to avoid the causes for the SCR costs described in response to AG-1-2? Specifically describe any actions undertaken, including milestone dates, and describe why these efforts were unsuccessful in avoiding the SCR costs.
- AG-1-7 How would the Company recover the costs associated with the elimination of the SCR costs?

- AG-1-8 Are the causes for the SCR costs related to the causes for any of the RMR costs incurred in 2005? If yes, explain how they are related and whether the action that eliminates the SCR costs, as described in the response to AG-1-3, would also eliminate or reduce the RMR costs.
- AG-1-9 Produce a copy of the Capital Projects Scheduling List created by the Company in order to comply with Article VII of the rate settlement approved in DTE 04-106.
- AG-1-10 Did any of the tasks described in the Capital Projects Scheduling List reduce or eliminate RMR or SCR costs for the Company's customers in the Western Massachusetts service territory? If yes, describe the projects in detail and quantify the avoided costs for 2005 and 2006 (to date). If no, explain in detail why RMR and SCR cost avoidance tasks were not included on the list.
- AG-1-11 Do any of the actions described in response AG-1-3 appear on the Capital Projects Scheduling List provided in response to AG-1-9? If any of the actions listed in AG-1-3 do not appear on the Capital Projects Scheduling List, describe in detail why the Company did not include these actions in the Capital Projects Scheduling List.
- AG-1-12 Please state whether the Company uses a system of monthly, quarterly or yearly budgeting. For each of the years 2001-2006, please identify and produce a copy of the these budgets for each department and cost category for the Company.
- AG-1-13 In which department(s) and cost categories included in the response to AG-1-12 was the Company successful in reaching its budget targets?
- AG-1-14 Provide the name, title and employer of management and executive level employee responsible for recommending and approving budget targets for the Company in 2004, 2005 and 2006. Include in this response Company employees, as well as affiliate and parent company employees.
- AG-1-15 For all the actions listed in response to AG-1-3, please identify from the response to AG-1-12 which department and cost category would have included the costs of these actions, if the actions were undertaken by the Company?
- AG-1-16 For all the tasks listed in response to AG-1-9, please identify from the response to AG-1-12 which department and cost category includes the costs of these projects.

August 4, 2006